Appendix I. Analysis, responses and preferred approach to residential space standards, plus summaries of representations received

# Appendix I: Analysis, responses and preferred approach to residential space standards, plus summaries of representations received

## **CHAPTER 9 – DELIVERING HIGH QUALITY HOUSING**

## **ISSUE - RESIDENTIAL SPACE STANDARDS**

Total representations: 106					
Object:					
Option 106:	Option 107:	Option 108:	Option 109:	Option 110:	
6	6	6	4	4	
Support:					
Option 106:	Option 107:	Option 108:	Option 109:	Option 110:	
31	30	8	10	1	

OPTION NUMBER	KEY ISSUES			
Option 106 – Minimum standards based on the level of occupancy (bedspaces)  & Option 107 – Minimum space standards based on a range of dwelling types	<ul> <li>Current developments do not provide sufficient space for ordinary living;</li> <li>Option 106 should be combined with Option 107 as there are good aspects in both options;</li> <li>Minimum space standards for principal rooms are desirable but the areas counting towards meeting the standard should have minimum headroom of at least two metres, preferably 2.1. There might be some relaxation for under eaves space but this should be minimal. Gross area for such rooms without any regard to height is not acceptable. All designated bedrooms should be large enough to accommodate an adult, their storage and dressing space;</li> <li>Option 106 is preferred to Option 107, which could produce properties that are difficult to adapt or sell in future. Spacious houses sell well and in general people are getting taller and proportionately larger;</li> <li>Minimum space standard should be based on occupancy levels;</li> <li>Space standards should be determined by the market. Those able to buy or rent in the open market can exercise choice in terms of the balance between standards, space, affordability and location;</li> <li>Imposing minimum space standards could adversely affect viability and deliverability of constrained sites, and would reduce the total number of units delivered in the city and the ability to deliver affordable homes and community facilities;</li> <li>Evidence from the Home Builders Federation shows that whilst dwelling sizes may be smaller in the UK, the</li> </ul>			

- average occupancy level of new housing within the UK is amongst the lowest in Europe;
- Increasing the size of homes necessarily increases costs to purchasers;
- This can be carried out through development control mechanisms for new development and does not need a specific policy. There is no need to repeat other legislation in the Local Plan;
- The first bedroom should always be big enough for two people to accommodate changes in circumstances;
- A number of respondents considered that Options 106 and 108 would represent a good combination of policies, whilst others considered that Options 107 and 109 would represent a good combination.
- Too many dwellings are far too small;
- Ceiling heights and principal rooms need minimum height and sizes. There is also a need for cycle, outdoor amenity and garden space;
- Developers will not voluntarily do this;
- It is in the interests of residents and the nonoverdevelopment of a site to do this;
- Increasing the size of homes necessarily increases costs to purchasers;

Option 108 – Minimum space standards for private outdoor amenity space only

&

Option 109 – General provision of outdoor amenity space

- There should not be a minimum standard for private outdoor amenity space. This should be determined by the market;
- There could be recommended standards for minimum private outdoor amenity space standards but with flexibility to tailor to specific circumstances, for example, it could be reduced if the site is constrained, or if there is a high proportion of public amenity space in close proximity;
- To impose a specific minimum requirement will be to constrain development sites coming forward, and will diminish the delivery of housing on certain sites. Each application should simply continue to be considered on merit as at the present time;
- The space provided should be appropriate to the development and its location. Gardens that are contiguous have greater amenity and ecological value than separate fragments of land. The overall open space requirement coupled with a common-sense approach on a case by case basis can produce better results;
- Minimum space standards need to be set out for outdoor amenity space, though not to the exclusion of other space standards;

- Properties need private outdoor space of a reasonable depth and width;
- Need for a long-term view of the immeasurable value of private gardens;
- A number of respondents considered that Options 106 and 108 would represent a good combination of policies, whilst others considered that Options 107 and 109 would represent a good combination.
- Those able to buy or rent in the open market can exercise choice in terms of the balance between standards, space, affordability and location;
- Imposing minimum space standards could adversely affect viability and deliverability of constrained sites, and the ability to deliver affordable homes and community facilities;
- Evidence from the Home Builders Federation shows that whilst dwelling sizes may be smaller in the UK, the average occupancy level of new housing within the UK is amongst the lowest in Europe;
- Increasing the size of homes necessarily increases costs to purchasers;
- Whilst well-intentioned, Option 109 may allow too many loopholes to be meaningful.

# Option 110 – No space standards specified

- Those able to buy or rent in the open market can exercise choice in terms of the balance between standards, space, affordability and location;
- Imposing minimum space standards could adversely affect viability and deliverability of constrained sites, and the ability to deliver affordable homes and community facilities;
- Evidence from the Home Builders Federation shows that whilst dwelling sizes may be smaller in the UK, the average occupancy level of new housing within the UK is amongst the lowest in Europe;
- Increasing the size of homes necessarily increases costs to purchasers;
- Standards are critical, no action is not a good option;
- The space provided should be appropriate to the development and its location. Gardens that are contiguous have greater amenity and ecological value than separate fragments of land. The overall open space requirement coupled with a common-sense approach on a case by case basis can produce better results.

## **NEW OPTIONS ARISING FOLLOWING COMMUNITY INVOLVEMENT**

The only other option suggested was the need for a policy on standards for shared outdoor space for blocks of flats.

#### **SUMMARY OF INTERIM SUSTAINABILITY APPRAISAL REPORT**

## **Option Number**

## Analysis

Options 106 – 110 on Residential Space Standards Option 106 is likely to ensure that the design and size of new homes will meet the needs of the existing and future population. Its focus on standards based upon bedspaces over bedrooms offers a more meaningful metric than bedrooms alone. Dwellings of a more suitable size may allow older people wishing to downsize an increased opportunity to do so. The London Housing Design Guide sets out space standards based on occupancy, in line with Option 106. These new mandatory minimum space standards are intended to ensure that all new homes in London are fit for purpose and offer the potential to be occupied over time by households of all tenures. Option 106 is therefore likely to significantly increase the quality of the city centre as a place to live. However, this option could affect the viability of some constrained development sites. Option 107 offers a less fine grain approach to improved space standards, based around the type of dwelling. Whilst this approach will likely deliver lower standards of design and size in comparison to option 106, it may reduce the burden placed on developers. Improved standards will nonetheless potentially result in some constrained sites being undevelopable.

By specifying no space standards, as in option 110, there would be no further requirements placed on developers. This may boost the provision of affordable and intermediate housing. However, it is likely that this approach would lead to a negative effect on the design and size of new homes. This may make successful communities less likely within the urban extensions of South Cambridge (as identified in the scoping report) and potentially reduce the quality of the city centre as a place to live.

By providing space standards for private outdoor amenity space, this option will potentially enhance open space provision citywide, with the possibility of associated gains in well being. It may result in some sites being undevelopable due to space constraints, with a potentially negative effect on affordable and intermediate housing provision. It may significantly improve the quality of the city centre as a place to live. Option 109, would encourage developers to provide an area of outdoor amenity space. However, this option does not provide specific space standards. This openness to

interpretation makes the effect of this option uncertain across all relevant sustainability topics.

#### **KEY EVIDENCE**

- Cambridgeshire County Council Research 'Housing Development in Cambridgeshire 2001-2011' August 2011;
- The National Affordable Homes Agency, 721 Housing Quality Indicators (HQI) Form, Version 4 (for NAHP 08-11) published Map 2007 and updated April 2008;
- Design and Quality Standards (April 2007) Housing Corporation;
- Cambridge City Council (2008), Affordable Housing SPD (paragraph 26, Page 10-11);
- Housing Act 1985 Part X Overcrowding 326 The Space Standards, Table II;
- GLA (2009), London Housing Design Guide;
- GLA (July 2011) The London Plan;
- CABE (2005) What Home Buyers Want: Attitudes and decision making among consumers;
- Bartlett K et al. (2002) Consumer Choice in Housing: The beginnings of s house buyer revolt, Joseph Rowntree Foundation;
- HATC (March 2010) Room to swing a cat? The Amount and Use of Space in New Dwellings in London and the South East;
- GVA Grimley (2010) Draft London Housing Design Guide: Cost and delivery impact assessment, pre-publication draft, London Development Agency.
- Cambridgeshire County Council (July 2012) Census 2011: Cambridgeshire Snapshot.

#### **CURRENT POLICY TO BE REPLACED**

Whilst these options do not replace an existing policy, they could link well with policy option 167 on *On-site provision of open space* in allowing the Council to understand how many occupiers the development is being planned for. The existing policy 3/8 *Open Space and Recreation Provision Through New Development* in the Cambridge Local Plan 2006 requires new developments to provide open space onsite or through commuted payments based on an occupation rate linked to the number of bedrooms provided per dwelling. Requiring a planning application to include information on the proposed maximum level of occupation of the dwellings proposed could inform requirements for provision of open space.

#### **ANALYSIS OF KEY ISSUES AND OFFICER RESPONSE**

#### **Introduction - Internal Space Standards**

The provision of sufficient space within new homes is an important element of good residential design and new dwellings should provide sufficient space for basic daily activities and needs. It is recognised that many new developments are perceived to provide inadequate amounts of both internal and external amenity space. This issue could be addressed by drafting policies on minimum residential unit sizes and external amenity space.

The current Local Plan does not include a policy setting out specific internal and

external space requirements. However, the Council's current Affordable Housing SPD specifies that Affordable Housing "should meet Housing Corporation Design and Quality Standards or any future replacement." Historically, there has been very limited national guidance on the issues connected with space standards within and around the home. Whilst Planning Policy Statements provided support for the development of residential space and layout standards, paragraph 50 of the National Planning Policy Framework states that Local Planning Authorities should plan for a mix of housing based on current and future democratic trends, market trends and the needs of different groups in the community, such as families with children, the elderly and people with disabilities.

A number of options were put forward in the Issues and Options report for policy development. These options were based on national guidance and research undertaken looking at policies set by other Local Planning Authorities. Option 106 proposed developing a policy, which sets out requirements for minimum standards based on bedspaces to be used for all new residential developments and conversions of existing dwellings to residential use. Option 107 suggested developing a new policy outlining the minimum internal floor space and storage space (in terms of gross floor area) for a range of dwelling types. Option 110 meanwhile proposed that the status quo be maintained, by taking the approach of not specifying either internal or external space standards and continuing to use the Homes and Communities Agency standards for all affordable housing delivered within the city.

In line with the findings of the Sustainability Appraisal for the Issues and Options Report, it is considered that Option 106 is most likely to ensure that the design and size of new homes will meet the needs of the existing and future population. Its focus on standards based upon bedspaces over bedrooms offers a more meaningful approach than bedrooms alone. Setting minimum space standards based on occupancy levels as per Option 106 allows for greater definition than the approach set out in Option 107 where unit sizes are based on the number of bedrooms provided.

It is considered that the introduction of minimum internal space standards for all rooms to be unnecessarily onerous. However, it would be appropriate to consider recommending a minimum bedroom size for single and double bedrooms respectively in order to ensure sufficient space for use by residents. Any room designated on plan as a study will need to be of at least the size of a single bedroom. By setting out bedroom/study sizes, this could help to assure reasonable living conditions. Where residential units built as single family dwellinghouses later become housing in multiple occupation, bedrooms and former study bedrooms often become the only private space available to an individual. In addition, reference will be made in the supporting text of the policy to the need for rooms to have a minimum headroom of 2.1metres in order to allow for reasonable levels of

<sup>&</sup>lt;sup>1</sup>Cambridge City Council Affordable Housing Supplementary Planning Document, January 2008, Paragraph 26, Pages 10-11.

storage and a sense of space. Any floorspace where the ceiling height is less than 2.1 metres will not count towards the gross internal floor area.

A number of respondents suggested that there was no need to have space standards as unit sizes should be determined by the market. In reality, those able to buy or rent in the open market may not truly exercise choice in seeking a balance between standards, space, affordability and location. Given the high price of housing in Cambridge compared to income, it is considered that affordability is often the key determinant in finding a home. Using space standards would allow for a minimum unit size to be instituted, providing accommodation of adequate size whatever the tenure. This approach would not prevent developers from producing larger units should they be marketable.

It is recognised that many developers do bring housing units forward in Cambridge, which are larger than the minimum unit sizes set out in the London Plan or the Homes and Communities Agency standards. However, these more generous units tend to be aimed towards the top end of the local housing market and also have a larger number of bedrooms. One and two bedroom units are produced in greater numbers in the city and are relatively less generous, with some examples falling well below known residential space standards elsewhere. This policy approach seeks to address those smaller units, where residential amenity may be severely compromised.

#### **Impacts on Viability**

The implementation of internal space standards through the planning process has understandably given rise to concern relating to some impacts on costs, viability, affordability and development capacity. The Council is in the process of testing the impact of the Community Infrastructure Levy on the economic viability of residential site typologies. Whilst it can be argued that space standards limit flexibility and innovation, there is also the potential to benefit from a consistent approach to quality in terms of standard unit sizes across new development in the city, regardless of tenure. It should also be noted that the introduction of the Community Infrastructure Levy may have an impact on the floorspace of proposed units as the levy is based on the number of square metres of accommodation provided by development. As such, developers may wish to reduce the size of developments to reduce Community Infrastructure Levy liability.

#### Occupancy levels of new housing in UK

Whilst the average occupancy level of new housing within the UK may be amongst the lowest in Europe, the way people are living is changing, with a consequent effect on number and size of households, as a result of changes in the age structure of the population, together with cultural influences on household formation and dissolution.

Data from the 2011 Census indicates that the city saw an increase of 4,000 households between the 2001 and 2011 censuses, taking the overall number of households to 46,700 in 2011. Additionally, the city saw a 13.4% increase in

residents aged between 0-19 years and an increase of 14.2% in residents aged 20-64 years between 2001 and 2011. No change was seen in the overall percentage of residents over 65 years of age. Whilst the 13.4% increase in residents aged between 0-19 years of age has been noted over the past few years in terms of NHS birth rate data and the need for additional school place provision in the city, it has also been observed by the Office of National Statistics that average household size in Cambridge increased from 2.2 in 2001 to 2.3 in 2011. Whilst this is not a large increase in household size, it does indicate that Cambridge has not adhered to the national trend of the average household size falling. Nationally, this has been tied to the likely increase in single person households.

#### Use of development control mechanisms

Consideration is being given to the inclusion of minimum residential space standards in the Cambridge Local Plan Towards 2031 in order to be open and consistent about the requirements for residential units. This provides greater certainty to developers at the outset of the development management process. Alternative development management mechanisms, such as conditions or the use of Section 106 agreements would not be reasonable approaches to applying minimum space standards as they would not be front-loaded to allow developers to appreciate the parameters of development in Cambridge. This would be contrary to the requirements of paragraph 174 of the National Planning Policy Framework, which states that "Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle."

## **Conclusions on Internal Space Standards**

Option 106 is considered to offer a more rigorous approach to the provision of particular residential space standards than Options 107 and 110. Following research of existing standards across the country and consideration of building a Cambridgespecific approach, it is considered that within Option 106, two main approaches on overall unit sizes require further consultation. The two approaches are set out in the recommendation below. Briefly, they comprise Option I.1 which originates from the London Housing Design Guide which informed the standards in the adopted London Plan (2011) and Option I.2, which stems from the Homes and Communities Agency Housing Quality Indicators (2008). As residential space standards are based on the amount of space needed for key items of furniture and circulation space within dwellings, a number of other Local Authorities have already set out their own space standards. Both the London Plan and Homes and Communities Agency approaches have been tested by Examination in Public and repeated use through the planning application process. The London Plan standards act as a starting point for 32 London boroughs and the Corporation of London. Although the standards were originally developed for housing in London, they are equally applicable in Cambridge as they cover a full range of dwelling types and consider the amount of space need for residents to function within their dwellings.

#### **External Space Standards**

Private amenity space can make an important contribution in improving the quality of life of the city's residents and supporting and enhancing local biodiversity. The National Planning Policy Framework sets out the need to seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings as one of the core planning principles in paragraph 17.

Whilst the Cambridge Local Plan 2006 does not contain a specific policy relating to the provision of amenity space for dwellings, the Issues and Options report seeks to address the provision of external amenity space by suggesting three alternative approaches. Option 108 proposed developing a policy with minimum space standards for private outdoor amenity space only. This would be based on the number of bedspaces within the dwelling and would exclude parking areas and turning spaces. Alternatively, Option 109 suggested introducing a policy where all new residential development (both private and affordable) should provide an area of outdoor private amenity space in the form of gardens, balconies, patios and roof terraces. Option 110 meanwhile proposed that the status quo be maintained, by taking the approach of not specifying either internal or external space standards and continuing to use the Homes and Communities Agency standards for all affordable housing delivered within the city.

A number of respondents suggested that there was no need to have space standards as unit sizes and amenity space should be determined by the market. It is not convincing that those able to buy or rent in the open market can truly exercise choice in seeking a balance between standards, space, affordability and location. Given the high price of housing in Cambridge compared to income, it is considered that affordability is often the key determinant in finding a home. However, there is a need to consider site constraints and context, such as the shape of the building plot and the character of the surrounding area. Cambridge has a number of areas of varying townscape character, with different densities, dwelling types and sizes, garden sizes and distances between dwellings. A universal approach would not necessarily be contextually suitable. As such, it is considered that a criteria-based approach based on key issues such as location and context, orientation, shape and size of amenity space and its usability, is the most appropriate way forward. Additionally, the number of bedspaces provided by the dwelling will need to be considered in reaching an appropriate solution, providing space for seating, play space, drying and storage space. This approach provides flexibility in design solutions, allowing the local context to be considered.

Whilst it is relatively straightforward to ascertain minimum standards for internal residential layout based on the size of standard items of furniture and the need for circulation space within dwellings, outdoor amenity area can also be configured in a similar manner. It is recognised that outdoor amenity space for dwelling units should provide sufficient space to accommodate a table and chairs suitable for the

size of dwelling; and where relevant, a garden shed for general storage (including bicycles where no garage provision or cycle storage to the frontage of the dwelling is possible) and space for refuse and recycling bins; an area to dry washing; circulation space and an area for children to play in. However, dependent on the context of the dwelling and the character of the surrounding area, this external amenity space could range significantly in size. As such, beyond setting out the types of structures and activities expected to be accommodated within a garden or other form of external amenity space, it is not considered appropriate to be prescriptive about minimum garden/balcony depths. It is considered that prescribing a given minimum depth for gardens/balconies would give rise to difficulties in delivering housing on constrained sites. Where a site is constrained, it may still be possible to bring housing forward with more innovative and usable solutions to the delivery of external amenity space. Although a garden length of less than 10 metres might not necessarily constitute a reason to refuse planning consent, it is considerably more likely that an application might be refused where gardens lack privacy and/or usable and accessible space; is dominated by car parking; or is subject to an unreasonable level of overlooking or enclosure.

The recommendation is to pursue a combination of Options 108 and 109, setting out a flexible, criteria based approach to determine adequate provision of external amenity space for houses and flats. The criteria will include those issues considered to be most influential in the development management process. In relation to combining policy options on internal and external spaces, it is considered appropriate to keep the two policy options separate. If combining the options, the policy developed could become unwieldy and unclear.

#### Review of local and national housing standards

There have been recent press reports surrounding the future of national planning and housing standards, with the Government announcing in September that it would be carrying out a review of local and national housing standards. We need to be mindful of this and any other changes as we take the Local Plan forward. However, it is considered that should there be a change to national housing standards, there is a stronger argument for the introduction of local policy requirements. Flexibility could be written into the policy that should nationally recognised standards be removed, other standards will be considered. For the time-being, it is considered appropriate to move forward with consultation on the suggested policy approaches on internal and external space standards.

#### RECOMMENDATION FOR PREFERRED APPROACH

#### **Recommendation for Internal Space Standards**

The preferred approach is to follow Option 106 on internal space standards. However, within Option 106, two main approaches on overall unit sizes require consultation. The two approaches are Option I.1 which originates from the adopted London Plan (2011) and Option I.2 which stems from the Homes and Communities Agency Housing Quality Indicators (2008). As residential space standards are based on the amount of space needed for key items of furniture and circulation space within dwellings, a number of other Local Authorities have already set out their own space standards. Both the London Plan and Homes and Communities Agency approaches have been tested by Examination in Public and repeated use through the planning application process. The main difference between the two options is the difference in overall unit sizes as indicated in the table provided below. More detail on the two options is outlined below in Table I.1.

Table I.1

Designed occupancy	Dwelling Type	Option I.1 (unit size in	Option I.2 (unit size in	
		square metres)	square metres)	
Flats				
1 bedspace	Studio	37	30 - 35	
2 bedspaces	1 bed flat	50	45 - 50	
3 bedspaces	2 bed flat	61	57 - 67	
4 bedspaces	2 bed flat	70	67 - 75	
4 bedspaces	3 bed flat	74	67 - 75	
5 bedspaces	3 bed flat	86	75 – 85	
5 bedspaces	4 bed flat	90	75 - 85	
6 bedspaces	4 bed flat	99	85 - 95	
2 storey houses				
4 bedspaces	2 bed	83	67 - 75	
4 bedspaces	3 bed	87	67 -75	
5 bedspaces	3 bed	96	82 - 85	
5 bedspaces	4 bed	100	82 - 85	
6 bedspaces	4 bed	107	95 - 100	
3 storey houses				
5 bedspaces	3 bed	102	85 - 95	
5 bedspaces	4 bed	106	85 - 95	
6 bedspaces	4 bed	113	100 - 105	
7 bedspaces	4 bed	123	108 - 115	

#### Option I.1 Minimum Internal Space Standards for Residential Development

This option is based on the standards adopted as part of the London Plan 2011. Although the standards were originally developed for housing in London, they are equally applicable in Cambridge as they cover a full range of dwelling types and consider the amount of space need for residents to function within their dwellings. Table 3.3 in Chapter 3 (page 88) of the London Plan 2011 sets out these minimum space standards for dwellings of different sizes. This is based on the minimum gross internal floor area (GIA) required for new homes relative to the number of occupants

and takes into account commonly required furniture and the spaces needed for different activities and moving around, in line with the Lifetime Home standards. This means developers should state the number of bedspaces/occupiers a home is designed to accommodate rather than simply the number of bedrooms. When designing homes for more than six persons/bedspaces, developers should allow approximately 10 square metres per additional bedspace/person.

The standards have been reached by a project group including architects, allowing for the minimum habitable room areas, the amount of circulation and storage space, and the number of bathrooms and WCs, which are considered desirable for each dwelling type, based on its potential occupancy. They are the result of extensive research including dimensions of standard furniture types and allowances for circulation space.

The standards would be applied on a cross-tenure basis, which would allow for the same unit sizes to be applied across Cambridge on both private and affordable dwellings. The standards are intended to encourage provision of enough space in dwellings to ensure that homes can be used flexibly by a range of residents with varied needs. The standards also aim to ensure that sufficient storage can be integrated into units. It is also important to consider that these standards are expressed as minimum space standards. Housing which exceeds minimum dwelling sizes will always be encouraged, and in order to achieve certain design configurations, work within site constraints or deliver units to a particular segment of the housing market, designers and developers may need to make early allowance to exceed the minimum gross internal area for that dwelling type. The standards have previously been through a rigorous examination process in London, including cost analysis of the implications of the proposed unit sizes upon the viability of development in a range of London boroughs. Given the additional costs incurred by requiring some developers to increase their standard unit sizes, these standards are easier to implement in areas where the market is more buoyant.

As can be seen in the table above, the London Plan's standards exceed the Homes and Communities Agency's Housing Quality Indicators in a number of cases, particularly for the dwellings designed to accommodate a greater number of residents. This could have an impact on the delivery of affordable housing where housing is being funded by grant funding for floorspace up to the level of the Homes and Communities Agency's Housing Quality Indicator standards only, leaving a gap of up to  $11m^2$  of floorspace.

## Option I.2 Minimum Internal Space Standards for Residential Development (Range of Unit Sizes)

This option is based on the Homes and Communities Agency's Housing Quality Indicators, which were developed in response to a perceived fall of standards in housing association developments and changing housing needs that affected the definition of housing quality. Housing providers receiving funding through the National Affordable Housing Programme (until 2011) and the Affordable Home Programme (2011 – 2015) must meet the Indicators. Additionally, all affordable

housing in Cambridge is required to meet the indicators in accordance with the Council's Affordable Housing Supplementary Planning Document. The Housing Quality Indicators system is a measurement and assessment tool designed to allow housing schemes to be evaluated on the basis of quality rather than simply of cost. The Housing Quality Indicators assess the quality of a housing project using three main categories: location, design and performance. These are subdivided into ten sections - the Indicators. An Housing Quality Indicators assessment generates separate scores for each Indicator producing a profile of the scheme, and an overall Housing Quality Indicators score. Dwelling unit size forms one of the Indicators. The unit sizes are given as a range in order to allow some flexibility. The unit sizes provided through the Housing Quality Indicators system vary from those provided in the London Plan, with the largest differences exhibited in the largest dwelling types (11 square metres difference between the top end of the Housing Quality Indicators range and the London Plan standard).

The Homes and Communities Agency produced new detailed design standards for new dwellings in 2010 which aligned with the Interim London Housing Design Guide, which informed the London Plan, using London as the starting point for implementation within the publicly subsidised affordable housing sector, but with the ultimate aspiration to roll the standards out nationally. On 25 November 2010, the Government announced that new core standards for development funded or on land owned by the Homes and Communities Agency would not be introduced. This was informed by concerns that standards would be difficult to achieve for developers in public build projects and would potentially cost an additional £8,000 for every dwelling. As such, the Homes and Communities Agency has maintained the use of the existing standards shown in the table above.

As Homes and Communities Agency Housing Quality Indicators provide a range of unit sizes, the use of these unit sizes on a cross-tenure basis across Cambridge could mean that developers might choose to develop private housing at the lowest end of the range of unit sizes.

#### Option I.3: General Provision of External Amenity Space

The recommendation is to pursue a combination of Options 108 and 109, setting out a flexible, criteria based approach to determine adequate provision of external amenity space for houses and flats. The criteria include those issues considered to be most influential in the development management process.

All new residential units will be expected to have direct access to an area of private amenity space. The form of amenity space will be dependent on the form of housing and could include a private garden, roof garden, balcony, glazed winter garden or ground level patio with defensible space from any shared amenity areas. The following criteria will be considered when assessing whether appropriate amenity space has been provided:

 Location and context of the development, including the character of the surrounding area;

- Orientation in relation to the sun at different times of year;
- Level of overlooking and enclosure impacting on the proposed dwelling and any neighbouring dwellings;
- Shape and size of the amenity space, including the access to that space and the practical usability of the space.

In terms of the usability of space, the policy will also make reference to the need to allow sufficient external amenity space to accommodate a table and chairs suitable for the size of dwelling; and where relevant, provision of a garden shed for general storage (including bicycles where no garage provision or cycle storage to the frontage of the dwelling is possible) and space for refuse and recycling bins; an area to dry washing; circulation space and an area for children to play in. In calculating how much space might be required, this will be based on bedspaces. External amenity space would not include car parking or turning areas. Suitable arrangements for access to refuse and recycling bins should be made, in order to prevent bins/bags being transported through dwellings.

One bedroom dwellings would not be expected to provide space for children to play, due to the low likelihood of children occupying these units. Larger dwellings would need to take space for children to play into account. In addition to private amenity space, developments with flats will need to provide high quality shared amenity areas on site to meet the needs of residents.

## RESPONSES TO RESIDENTIAL SPACE STANDARDS

## 9 - Delivering High Quality Housing 9.38

#### 11422 Support

#### Summary:

Houses are ridiculously small.

## 9 - Delivering High Quality Housing 9.39

#### **12597 Object**

#### Summary:

73% seems a hugely high figure and suggests that developers are attempting to maximise returns by making developments as dense as possible - I would urge the council to have the courage to fight against these and deliver what's right for the area and the city first and foremost.

## 9 - Delivering High Quality Housing 9.39

## 12644 Object

#### Summary:

Although there's been an increase in the number of applications for studio apartments/flats, this does not mean that these actually adequately house people. All one-person properties should be built to a size that could accommodate a second person (e.g. if their partner moves in, or if they have a baby, or an older relative comes to live with them), therefore each one-person property should be at least a one-bedroom flat (NOT a studio) and should have the bedroom at least 12 sq m (as per HCA requirements, see Local Plan appendix D).

## 9 - Delivering High Quality Housing 9.40

#### 6939 Object

#### Summary:

Incorrect. There were very generous space standards applied by Parker Morris since 1961.

"...a good house or flat can never be be made out of premises which are too small. As well as a place where the family can gather together, there must be room in every home for activities demanding privacy and quiet; there must be space to allow for better planned and better equipped kitchens with room in which to take at least some meals, and for more satisfactory circulation and storage." it defined minimum sizes for a dwelling without specifying how the interior of the dwelling should be partitioned

## 9 - Delivering High Quality Housing 9.47

## 12388 Support

#### Summary:

Additionally, there should be a high standard of noise insulation between adjacent dwellings (for flats, adjoined houses). Noise from outside the building is often not the major problem with new housing. This issue feeds into qualities of design, material and workmanship.

## 9 - Delivering High Quality Housing

## Option 106 - Minimum standards based on the evel of occupancy (bedspaces)

## 11008 Object

#### Summary:

Bidwells objects to the inclusion of policies that impose minimum space standards. Bidwells considers that this should be determined by the market. Imposing minimum space standards could adversely affect viability and deliverability of constrained sites, and would reduce the total number of units delivered in the City. Furthermore, there is no need to repeat other legislation in the Local Plan.

## 9 - Delivering High Quality Housing

## Option 106 - Minimum standards based on the evel of occupancy (bedspaces)

## **11253 Object**

#### Summary:

Do not consider there is case for space standards for market and intermediate market homes. Those able to buy or rent in the open market can exercise choice in terms of the balance between standards, space, affordability and location.

Evidence from the HBF shows that whilst dwelling sizes may be smaller in the UK, the average occupancy level of new housing within the UK is amongst the lowest in Europe.

Increasing the size of homes necessarily increases costs to purchasers.

Increasing cost of homes will also affect the viability of schemes and the ability to deliver affordable homes and community facilities.

## 9 - Delivering High Quality Housing

Option 106 - Minimum standards based on the evel of occupancy (bedspaces)

#### 12598 Support

#### Summary:

Agreed

## 9 - Delivering High Quality Housing

Option 106 - Minimum standards based on the evel of occupancy (bedspaces)

#### 13020 Support

#### Summary:

I strongly support this. I disagree with the conclusion that this makes some sites not viable for development.

All it means is that some sites will have to be sold to developers or private individuals for a prize that reflects their true value and perhaps this will correct some of the inflated prices for development land which currently results in very crammed housing.

## 9 - Delivering High Quality Housing

Option 106 - Minimum standards based on the evel of occupancy (bedspaces)

#### 13458 Support

#### Summary:

Current developments often do not provide enough space for the requirements of ordinary living.

## 9 - Delivering High Quality Housing

Option 106 - Minimum standards based on the evel of occupancy (bedspaces)

#### 14866 Support

#### Summary:

Combine with aspects of option 107 as there are good things in both of them.

## 9 - Delivering High Quality Housing

## Option 106 - Minimum standards based on the evel of occupancy (bedspaces)

## 15268 Support

#### Summary:

Standards should take account of height as well as area.

## 9 - Delivering High Quality Housing

## Option 106 - Minimum standards based on the evel of occupancy (bedspaces)

## **15494 Object**

#### Summary:

We object to Option 106 as there is no need for a policy of this nature. The Council can control the quality of new developments through normal development control mechanisms. This option would threaten the viability of development and the delivery of housing.

## 9 - Delivering High Quality Housing

Option 106 - Minimum standards based on the evel of occupancy (bedspaces)

#### 16699 Support

#### Summary:

There should be a minimum space standard based on occupancy levels.

## 9 - Delivering High Quality Housing

Option 107 - Minimum space standards based on a range of dwelling types

## 9953 Support

#### Summary:

Too many dwellings are far too small.

## 9 - Delivering High Quality Housing

Option 107 - Minimum space standards based on a range of dwelling types

#### **11010 Object**

#### Summary:

Bidwells objects to the inclusion of policies that impose minimum space standards. Bidwells considers that this should be determined by the market. Imposing minimum space standards could adversely affect viability and deliverability of constrained sites, and would reduce the total number of units delivered in the City. Furthermore, there is no need to repeat other legislation in the Local Plan.

## 9 - Delivering High Quality Housing

Option 107 - Minimum space standards based on a range of dwelling types

## 11254 Object

#### Summary:

Do not consider there is case for space standards for market and intermediate market homes. Those able to buy or rent in the open market can exercise choice in terms of the balance between standards, space, affordability and location.

Evidence from the HBF shows that whilst dwelling sizes may be smaller in the UK, the average occupancy level of new housing within the UK is amongst the lowest in Europe.

Increasing the size of homes necessarily increases costs to purchasers.

Increasing cost of homes will also affect the viability of schemes and the ability to deliver affordable homes and community facilities.

#### 9 - Delivering High Quality Housing

Option 107 - Minimum space standards based on a range of dwelling types

#### Summary:

This appears to be the most attractive policy - developers will not voluntarily do this and it's in the interests of residents and the non-overdevelopment of a site to do this.

## 9 - Delivering High Quality Housing

Option 107 - Minimum space standards based on a range of dwelling types

#### 12988 Support

#### Summary:

Ssupport. See too many developments with 'mean spaces' and illusionistic space internally. Ceiling heights and principle rooms need a miminum. External storage- cycles and garden space.

## 9 - Delivering High Quality Housing

Option 107 - Minimum space standards based on a range of dwelling types

#### 14867 Support

#### Summary:

Combine with aspects of option 106 as there are good things in both of them.

## 9 - Delivering High Quality Housing

Option 107 - Minimum space standards based on a range of dwelling types

#### 15269 Support

#### Summary:

Standards should take account of height as well as area.

## 9 - Delivering High Quality Housing

Option 107 - Minimum space standards based on a range of dwelling types

#### **15495 Object**

#### Summary:

We object to Option 107 as there is no need for a policy of this nature. The Council can control the quality of new developments through normal development control mechanisms. This option would threaten the viability of development and the delivery of housing.

## 9 - Delivering High Quality Housing

Option 108 - Minimum space standards for private outdoor amenity space only

#### 9954 Support

#### Summary:

I think it is only reasonable for people to have some private outdoor amenity space.

## 9 - Delivering High Quality Housing

Option 108 - Minimum space standards for private outdoor amenity space only

## **11012 Object**

#### Summary:

Bidwells considers that there should not be a minimum standard for private outdoor amenity space; this should be determined by the market. Bidwells considers that there could be recommended standards for minimum private outdoor amenity space standards but with flexibility to tailor to specific circumstances, for example, it could be reduced if the site is constrained, or if there is a high proportion of public amenity space in close proximity.

## 9 - Delivering High Quality Housing

Option 108 - Minimum space standards for private outdoor amenity space only

Summary:

Support

## 9 - Delivering High Quality Housing

Option 108 - Minimum space standards for private outdoor amenity space only

#### 13016 Support

Summary:

I am in strong support of this option

## 9 - Delivering High Quality Housing

Option 108 - Minimum space standards for private outdoor amenity space only

#### 14868 Support

Summary:

Support

## 9 - Delivering High Quality Housing

Option 108 - Minimum space standards for private outdoor amenity space only

## **15270 Object**

Summary:

Not acceptable as town houses can be developed on a garden square and city centre apartments have different space requirements. The space provided should be appropriate to the development and its location. Gardens that are contiguous have greater amenity and ecological value than separate fragments of land. I think this is an area where the overall open-space requirement coupled with a common-sense approach on a case by case basis can produce better results. Public scorn at the planning stage can be a powerful persuader.

## 9 - Delivering High Quality Housing

Option 108 - Minimum space standards for private outdoor amenity space only

## **15434 Object**

Summary:

Agree that minimum provisions need to be set for outdoor amenity space, though not to the exclusion of other space standards.

## 9 - Delivering High Quality Housing

Option 108 - Minimum space standards for private outdoor amenity space only

## **15496 Object**

Summary:

We object to Option 108 on the basis that the policy is unnecessary, and the Council can determine whether appropriate quality living accommodation (including amenity and open space) is delivered through the normal development control processes.

## 9 - Delivering High Quality Housing

Option 109 - General provision of outdoor amenity space

## 11424 Support

Summary:

Obviously needed....

## 9 - Delivering High Quality Housing

Option 109 - General provision of outdoor amenity space

#### Summary:

Yes. essential. Room for a tree.

## 9 - Delivering High Quality Housing

## Option 109 - General provision of outdoor amenity space

## 13017 Object

#### Summary:

I think while perhaps well intentioned, will just allow too many loopholes to be meaningful.

## 9 - Delivering High Quality Housing

Option 109 - General provision of outdoor amenity space

## 14869 Support

#### Summary:

Support

## 9 - Delivering High Quality Housing

Option 109 - General provision of outdoor amenity space

## **15271 Object**

#### Summary:

Not acceptable as town houses can be developed on a garden square and city centre apartments have different space requirements. The space provided should be appropriate to the development and its location. Gardens that are contiguous have greater amenity and ecological value than separate fragments of land. I think this is an area where the overall open-space requirement coupled with a common-sense approach on a case by case basis can produce better results. Public scorn at the planning stage can be a powerful persuader.

## 9 - Delivering High Quality Housing

Option 109 - General provision of outdoor amenity space

## 15497 Support

#### Summary:

Compared to Options 107 and 108, this option has some merit, and we would be content to support the principle of some delivery on each site, without specifying a minimum standard.

#### 9 - Delivering High Quality Housing

Option 110 - No space standards specified

#### 11257 Support

#### Summary:

Support not having space standards for market and intermediate market homes.

Those able to buy or rent in the open market can exercise choice in terms of the balance between standards, space, affordability and location.

Evidence from the HBF shows that whilst dwelling sizes may be smaller in the UK, the average occupancy level of new housing within the UK is amongst the lowest in Europe.

Increasing the size of homes necessarily increases costs to purchasers.

Increasing cost of homes will also affect the viability of schemes and the ability to deliver affordable homes and community facilities.

#### 9 - Delivering High Quality Housing

Option 110 - No space standards specified

#### **13018 Object**

#### Summary:

I think that standards are critical, so not doing anything is not a good option.

## 9 - Delivering High Quality Housing Option 11

## Option 110 - No space standards specified

## **15272 Object**

#### Summary:

Not acceptable as town houses can be developed on a garden square and city centre apartments have different space requirements. The space provided should be appropriate to the development and its location. Gardens that are contiguous have greater amenity and ecological value than separate fragments of land. I think this is an area where the overall open-space requirement coupled with a common-sense approach on a case by case basis can produce better results. Public scorn at the planning stage can be a powerful persuader.

## 9 - Delivering High Quality Housing

Question 9.24

## 7116 Support

Summary:

Yes

## 9 - Delivering High Quality Housing

**Question 9.24** 

## 7762 Support

#### Summary:

Yes, to ensure a wide mix of sizes of property - there seems to be a predominance of 2 bed flats, but not so many flats with a 3rd or 4th bedroom to make it suitable for families. Minimum space requirements also required so developers don't squeeze too much creating unaccaptable living standards.

#### 9 - Delivering High Quality Housing

Question 9.24

## 9498 Support

Summary:

Yes

## 9 - Delivering High Quality Housing

**Question 9.24** 

## **11258 Object**

#### Summary:

Do not consider there is case for space standards for market and intermediate market homes. Those able to buy or rent in the open market can exercise choice in terms of the balance between standards, space, affordability and location.

Evidence from the HBF shows that whilst dwelling sizes may be smaller in the UK, the average occupancy level of new housing within the UK is amongst the lowest in Europe.

Increasing the size of homes necessarily increases costs to purchasers.

Increasing cost of homes will also affect the viability of schemes and the ability to deliver affordable homes and community facilities.

## 9 - Delivering High Quality Housing

**Question 9.24** 

#### 11504 Support

Summary:

Support

## 9 - Delivering High Quality Housing

**Question 9.24** 

Summary:

The case for a policy is well argued in the I&O document, so yes.

9 - Delivering High Quality Housing Question 9.24

12601 Support

Summary:

Yes

9 - Delivering High Quality Housing Question 9.24

14122 Support

Summary:

Yes

9 - Delivering High Quality Housing Question 9.24

16542 Support

Summary:

Yes.

9 - Delivering High Quality Housing Question 9.24

16841 Support

Summary:

Yes - support.

9 - Delivering High Quality Housing Question 9.24

## 17452 Support

Summary:

As with 7.1-3, there is insufficient focus in the 2006 Plan on adequate internal space and quality requirements proportionate to household needs, including opportunities for spare rooms, adequate storage, etc. All homes designed for families should also have adequate gardens, wider outdoor amenity spaces and safe, relaxed, child-friendly access

9 - Delivering High Quality Housing Question 9.24

17949 Support

Summary:

Yes - most certainly

9 - Delivering High Quality Housing Question 9.24

## 18243 Support

Summary:

There is a need for a policy that refers to space standards.

## 9 - Delivering High Quality Housing Question 9.24 18327 Support Summary: Yes 9 - Delivering High Quality Housing Question 9.25 7004 Object Summary: Ideally there would be no further new buildings planned in Cambridge without existing buildings being removed. However, if further developments are to be provided then I would prefer Option 106 to the others suggested. 9 - Delivering High Quality Housing **Question 9.25** 7117 Support Summary: Probably Option 107. In addition to having sufficient space to swing the proverbial cat there must be adequate storage space, both internally and externally. 9 - Delivering High Quality Housing Question 9.25 8480 Support Summary: Options 107 and 109 9 - Delivering High Quality Housing Question 9.25 9207 Support Summary: Options 106 and 108 9 - Delivering High Quality Housing Question 9.25 9504 Object Summary: Options 106 and 108 There is a possible loop-hole in the final paragraph of 106 because inaccuracies may occur in the number of bed spaces.

9 - Delivering High Quality Housing Question 9.25

#### 10300 Support

Summary:

107

## 9 - Delivering High Quality Housing Question 9.25

## 10432 Object

Summary:

Object to policies 107 to 110 but support policy 106. This is more flexible and less draconian and interfering.

## 9 - Delivering High Quality Housing Question 9.25

## 10623 Support

Summary:

107 and 108

## 9 - Delivering High Quality Housing Question 9.25

## **10733 Object**

Summary:

A combination of 107 and 109 is the best option. People need space to live satisfactory lives especially with young children.

## 9 - Delivering High Quality Housing Question 9.25

## 11259 Object

Summary:

Do not consider there is case for space standards for market and intermediate market homes. Those able to buy or rent in the open market can exercise choice in terms of the balance between standards, space, affordability and location.

Evidence from the HBF shows that whilst dwelling sizes may be smaller in the UK, the average occupancy level of new housing within the UK is amongst the lowest in Europe.

Increasing the size of homes necessarily increases costs to purchasers.

Increasing cost of homes will also affect the viability of schemes and the ability to deliver affordable homes and community facilities.

#### 9 - Delivering High Quality Housing Question 9.25

#### 11505 Support

Summary:

Prefer Option 106

## 9 - Delivering High Quality Housing Question 9.25

#### 11515 Support

Summary:

Prefer Option 106.

The tendency is for developers to increase the number of bedrooms without increasing the size of properties - this means the bedrooms become smaller and less habitable. If a bedroom is uninhabitable, the space is thus wasted as it's unusable for living space.

## 9 - Delivering High Quality Housing Question 9.25

#### **12157 Object**

#### Summary:

A combination of 107 and 109.

## 9 - Delivering High Quality Housing Question 9.25

## 12602 Support

#### Summary:

Option 106 as the most stringent (having read through them again!)

## 9 - Delivering High Quality Housing Question 9.25

#### 13374 Support

#### Summary:

Our client considers that Option 109 which would be to introduce a policy outlining that all new residential development should seek to provide an area of outdoor private amenity space in the form of gardens, balconies, patios or roof terraces. This option would allow for flexibility in bringing forward new homes for Cambridge, incomplicance with NPPF paragraph 21 ensuring an over-burden of combined requirements of planning policy expectations does not arise.

## 9 - Delivering High Quality Housing Question 9.25

## 14120 Support

#### Summary:

Option 106

## 9 - Delivering High Quality Housing Question 9.25

## 15840 Support

#### Summary:

We agree that minimum space standards for new housing, including external private amenity space are necessary. Recent planning applications in East Chesterton which have in our view constituted over development have ignored the need for adequate internal and external private spaces. We do not support Option 109 and 110.

## 9 - Delivering High Quality Housing Question 9.25

## 16544 Support

#### Summary:

Options 106 and 108 preferred.

## 9 - Delivering High Quality Housing Question 9.25

## 16842 Support

#### Summary:

We prefer option 106. The historical record shows that it is always a mistake in the long term to skimp on quality for short-term economic or social gain.

## 9 - Delivering High Quality Housing Question 9.25

#### Summary:

Option 107 - The current policy does not enforce sufficient living space or storage space. Developers are too keen to maximise their value for £ per sq. ft, rather

than focusing on the need for acceptable living space.

## 9 - Delivering High Quality Housing Question 9.25

## **18245 Object**

#### Summary:

Option 106 proposes that such standards would dictate the gross internal area of the dwelling and that space standards would be based on the level of occupancy and dwelling types, which is to be welcomed.

However, there is a danger that setting a minimum internal floor area for bedrooms could be used as a design criteria by developers rather than for a worst case scenario such

as for a quest bedroom or in exceptional circumstances.

Occupancy levels should be used to set minimum standards for all new residential developments. Option 106 need not be too onerous on the viability of a site.

Option 109 providing for outdoor amenity space would work well in conjunction with a less prescriptive Option 106, or Option 107 if that were chosen.

## 9 - Delivering High Quality Housing Question 9.25

## 18328 Support

#### Summary:

**Options 107 and 109** 

## 9 - Delivering High Quality Housing Question 9.26

## 9208 Support

#### Summary:

There should also be a policy on standards for shared outdoor space for blocks of flats etc (play areas, general open space, trees and shrubs).

## 9 - Delivering High Quality Housing Question 9.26

## **12159 Object**

#### Summary:

Building consumer awareness about the space they are buying (and specification in general) should also be considered. Developers like an ill-informed customer with a low design awareness. This should be challenged somehow.

## 9 - Delivering High Quality Housing Question 9.26

## **12751 Object**

#### Summary:

The first bedroom (and the only bedroom in the case of one-bedroom properties) should always be big enough for two people i.e. 12 sq m (as per HCA indicators - Local Plan, Appendix D). This would allow for changes in circumstances to be accommodated without the need to move e.g. a partner or older relative could move in. This would certainly help ease pressure on Council waiting lists (and free up the partners existing property). Exceptions could be made for student accommodation - students would not normally be expected to share during their course of studies.

## 9 - Delivering High Quality Housing Question 9.26

#### 12755 Object

#### Summary:

We should make all properties built/developed for rent/sale have private outside space (N.B. not overlooked from road, + not including parking/turning space) depth of at least 10 sq m, and width at least same as property width. Communal developments should meet this also (even though there gardens might not be fenced off from each other). Exceptions should be made for owners building their own properties that they themselves are to live in.

## 9 - Delivering High Quality Housing Question 9.26

#### 12995 Support

#### Summary:

The value of private gardens is not expressed or mentioned as a policy. There is immeasurable wellbeing and sustainable values to homes with gardens, small and large. Victorian terraces were built on the principle of each garden could hold an apple tree. Contiguous gardens create green corridors and privacy. Longterm views must be taken.

## 9 - Delivering High Quality Housing Question 9.26

## 14167 Support

#### Summary:

I am not an expert and find it hard to judge between the options - but I have a sense that residential developments are frequently built with too little outside amenity space. This leads to a sense of being hemmed in, allows little space for children to play outdoors or for people to grow their own vegetables for example.

## 9 - Delivering High Quality Housing Question 9.26

#### **17951 Support**

Summary:

Nο

## 9 - Delivering High Quality Housing Question 9.26

## **18329 Object**

#### Summary:

As mentioned above, the UK has in recent years had one of the worst space standings compared to other countries. Policies in this area will be good such as in the London Plan. How CCC cannot engineer occupancy rate in an open market. Furthermore, building consumer awareness about the space they are buying (and specification in general) should also be considered. Developers like an ill-informed customer with a low design awareness. This should be challenged somehow.

## 9 - Delivering High Quality Housing Question 9.27

## 17952 Support

Summary:

No

## 9 - Delivering High Quality Housing Question 9.27

#### **18330 Object**

#### Summary:

Yes, greater awareness building.

9209 Object	
Summary:	
No, they should apply in all cases	
9 - Delivering High Quality Housing	Question 9.28
9506 Object	
Summary:	
No. Every unit should comply.	
9 - Delivering High Quality Housing	Question 9.28
12165 Support	
Summary:	
Yes, it probably should but the threshold should be quite lo	ow.
9 - Delivering High Quality Housing	Question 9.28
14123 Support	
Summary:	
Yes	
9 - Delivering High Quality Housing	Question 9.28
16545 Object	
Summary:	
No, every unit should comply with these standards.	
9 - Delivering High Quality Housing	Question 9.28
17953 Object	
Summary:	
Yes	
9 - Delivering High Quality Housing	Question 9.28
18331 Support	
Summary:	
Yes	